

[110 throughout]



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Additionally, on a continuous and ongoing basis, Program Compliance Managers and Administrative staff scrutinize every signature submitted by clients and counselors in BriteWorks for billing purposes to ensure that the client was actually present for in-person billed services, that signatures presented are consistent with prior signatures, and that program rules and policies were followed in completing the forms. Forms found to contain errant signatures are marked for negation and a deduction of reimbursable amounts.

Monthly, TPCN reviews Provider performance to detect areas of service in need of continuation training. This review is conducted by TPCN's Program Services Manager, and she also provides ongoing Program training as necessary.

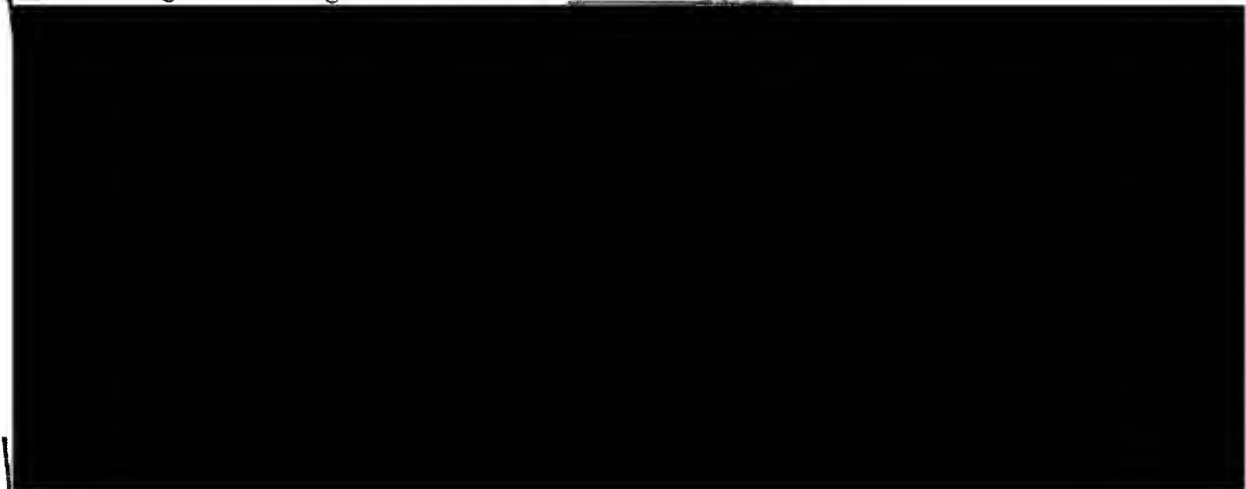
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If any of the above compliance methods yields instances of non-compliance, those instances are reported, and TPCN deducts the value of those services from the Service's Provider's reimbursement. If excessive deductions are recorded for a Provider, the Provider is scheduled for an over the phone or in-person retraining by TPCN. If a retraining does not reduce the amount of Provider errors, the Provider's contract will be suspended or terminated.

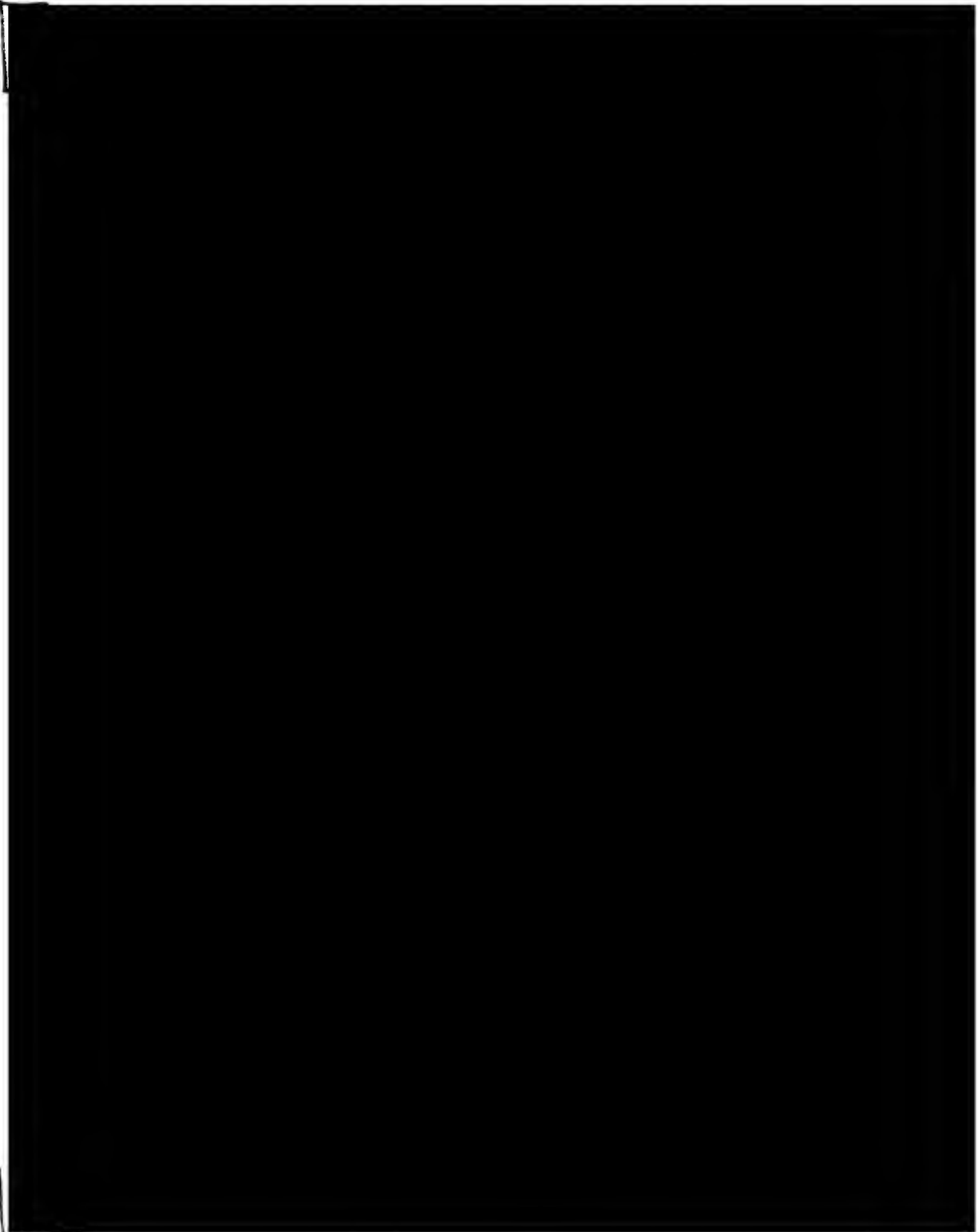
TPCN relays deductions from Providers in its 4th Quarter Report to HHSC in a report entitled "Annual Reimbursement Compliance Report".

TPCN will continue to utilize its extensive and proven oversight and compliance methods for its Provider network to ensure that the Program is utilizing taxpayer dollars in the most efficient and effective manner in the coming years.

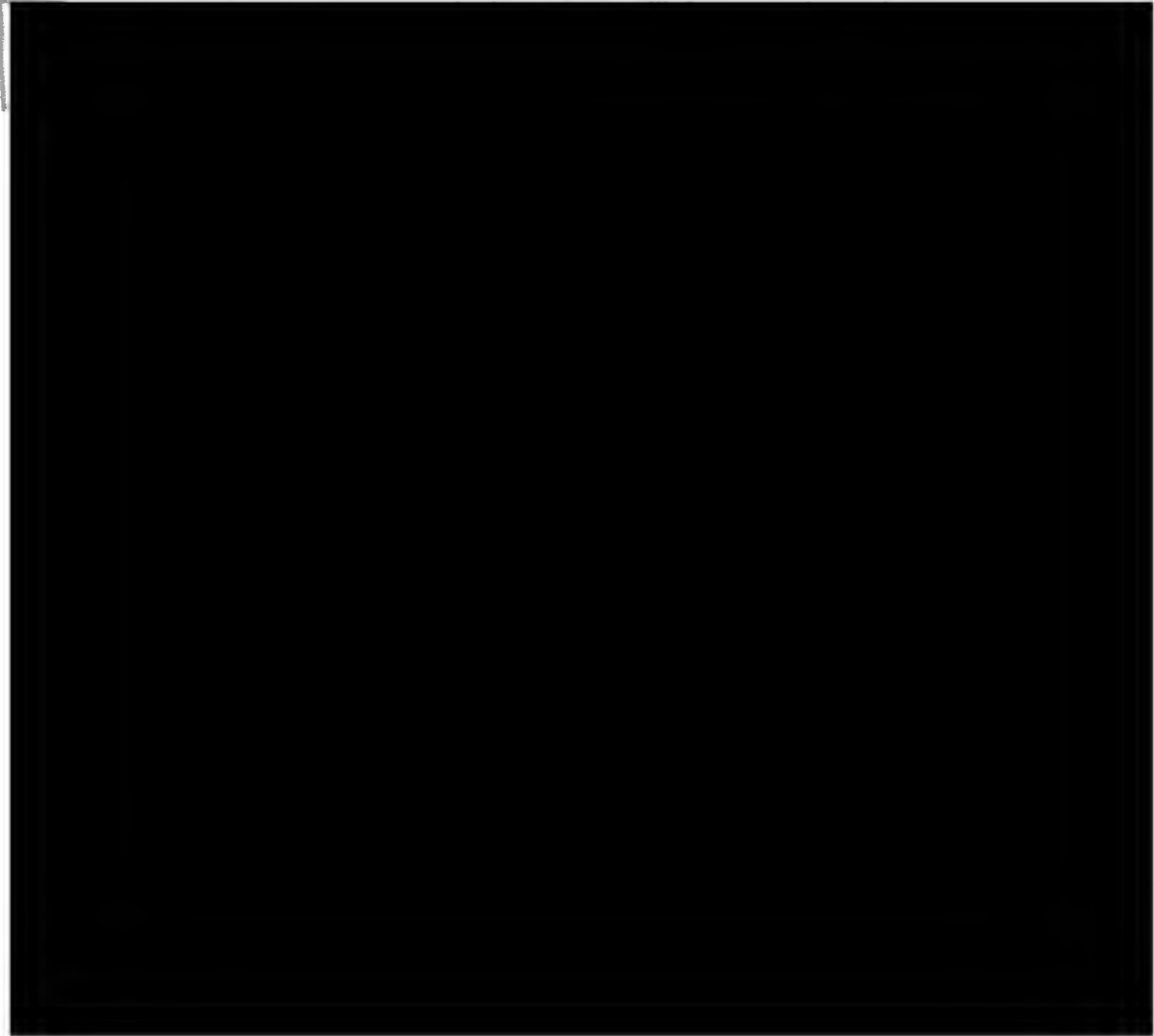
g. 2.5.5: Program Database **TRADE SECRET**



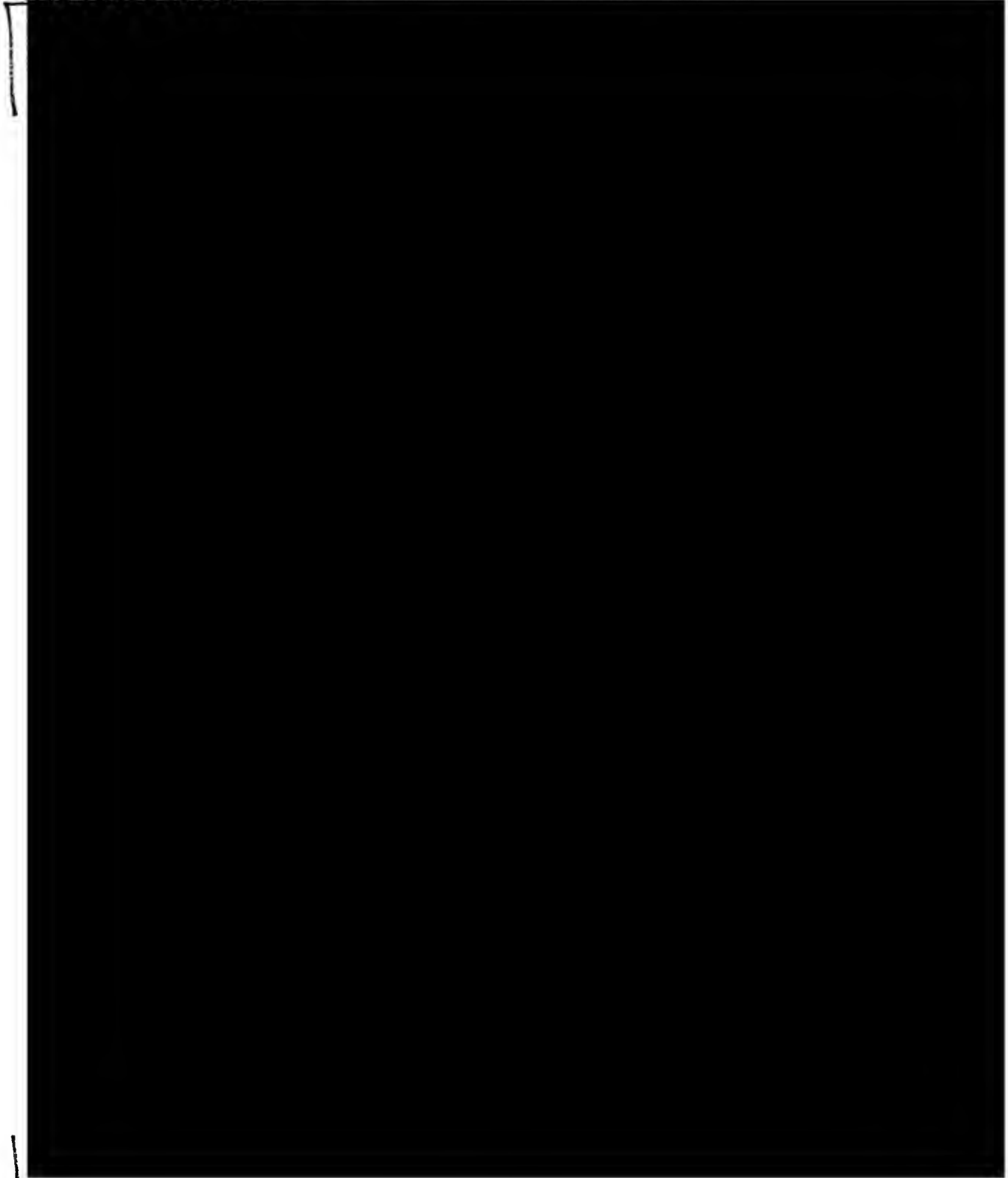
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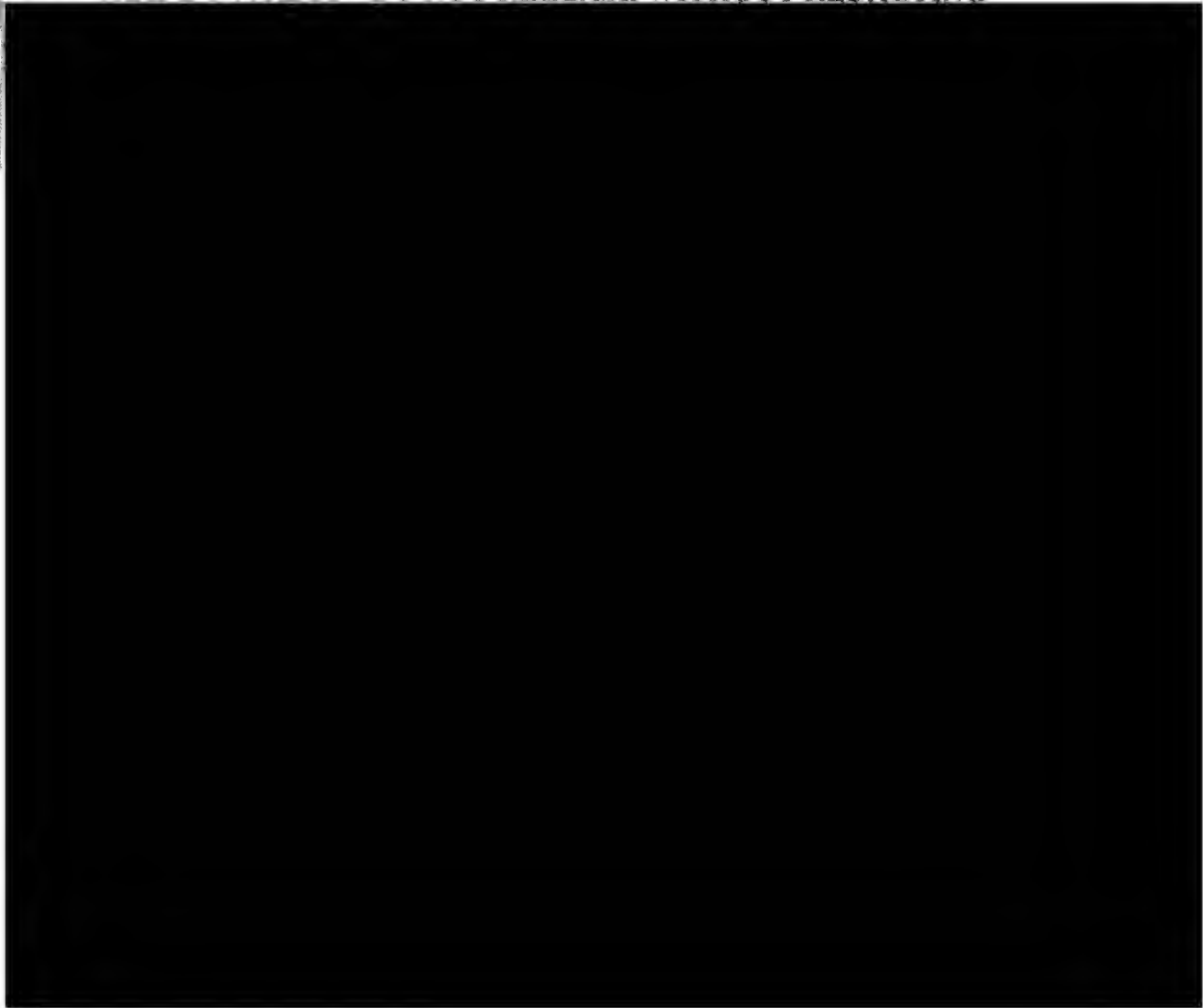
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Once you submit the invoice, BriteWorks will provide you a summary of the services that were provided on that invoice.



- h. 2.6.0: Development of a work plan for client services, to include:
- i. 2.6.1: Mentoring and Case Management **TRADE SECRET**

In the Program, “counseling” is defined as time spent talking to or in discussion with a Program beneficiary for the purpose of improving a client’s pregnancy or parenting situation. The term “counseling” is used in the broad sense including both the kind of formal counseling provided by licensed professionals, as well as peer counseling, a more informal “mentoring” provided by persons with less specialized training.

Counseling can occur with any eligible client. Counseling is typically conducted face-to-face and in person, whether at your agency or at some offsite location.

Reimbursable counseling will always involve communication: one person talking (or signing in the case of a hearing-impaired counselor or client) and another listening or watching, or vice versa. Electronic communication such as email or texting is not reimbursable, nor is simply playing an educational video for a client with no discussion of content.

TPCN’s Provider Network will continue to provide referrals and applicant assistance for HHSC Programs, as it has for the past 12 years. Referrals to third party organizations (including HHSC Programs) are one of the four reimbursable services that the Program has provided for clients. TPCN will be providing new and additional training on the various HHSC programs to all counselor/mentors that are providing services. The training will describe each HHSC Program and its objectives.

- j. 2.6.2: Goods and Services **TRADE SECRET**

Materials assistance is defined as the distribution of tangible goods to an eligible beneficiary for the purpose of improving a client’s pregnancy or parenting situation. **In order to be**



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reimbursable, materials assistance must be accompanied by a class or at least 15 minutes of counseling during the same session.

Distributions are appropriate for reimbursement when they can properly be categorized within any of the following eight categories:

- Food
- Maternity Clothing
- Diapers
- Baby Clothing
- Baby Furniture
- Baby Accessories
- Toiletries
- Educational Materials Approved by TPCN

Materials assistance is capped at 56 distributions over the course of a period extending from anytime during the client's pregnancy up to the child's third birthday.

In designing the A2A Program, TPCN balanced all facets of the Program to achieve the highest coverage of Program services with protections in place to ensure the long-term viability of the Program. TPCN balances the highest quality Program services and the greatest coverage of services with minimizing the opportunity for any taxpayer funds being wasted or abused. The Program currently recognizes the need to have services available to clients that may live a significant distance from the Provider, but balances this need with ensuring that services are accountable for the highest Program integrity. The Program has two rules to accomplish this important balance:

- The Provider may offer reimbursable program counseling, mentoring and support to the client via telephone as long as the client is seen in-person within 10 days (before or after) of the telephone counseling session. The in-person session requires a client signature to confirm services were delivered, and that signature is included in the invoice to seek reimbursement for any phone counseling that occurs 10 days (before or after) of the in-person counseling session.
- The Provider may deliver reimbursable off-site Program services to the client in-person as long as the services are delivered in a safe and confidential environment and the client verifies the services with a signature. Thus, the Provider may travel to a location that is more accessible to a client that has transportation difficulties.

TPCN continues to assert that these rules best achieve the important balance of ensuring Program services can be delivered to clients with transportation challenges and the integrity of taxpayer dollars allocated to the Program. Given these Program rules and the current Program coverage





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(which has been outlined many times), TPCN, in its expert opinion, does not believe that any further modifications of the Program are necessary. In fact, TPCN asserts that further relaxing these rules or introducing new reimbursement streams for transportation would lessen the overall Program integrity and create additional potential liability for the Program. Transportation of clients is inherently one of the highest liability exposure areas in tort law given the risk of accidents, and even reimbursement of third party transportation expenses introduces an unreasonable level of liability exposure to the Program.

k. 2.6.3: Classes **THIS ENTIRE SECTION IS A TRADE SECRET**

A reimbursable “class” is defined as one or more eligible beneficiaries gathered for at least one hour’s worth of educational instruction that improves the pregnancy or parenting situation.

All educational content must be approved by TPCN. If your instructor is not using any materials beyond a lecture, you can use Appendix J to help summarize a class outline for submission.

Again, as with counseling, a class must involve speech to be a reimbursable event. Playing an hour-long video to a group of students is not reimbursable as an hour-long class. However, using video clips throughout a class is acceptable.

**Name of Classes** – Provided below

**Location of Classes** – See the list of Statewide A2A locations

**Date** – Classes are provided every day of the year except state holidays

**Time** – Classes are provided every hour of the day from 8 am until 7pm

**TPCN Monitoring Attendance** – Starting on page 11 of Form H of TPCN’s RFA submission, TPCN describes in great detail how a counselor/mentor enters a new client into the BriteWorks system, has the client complete and digitally sign a Spiritual Preferences Form, has the client complete and sign a Session Stamp (indicating that reimbursable services are about to commence), and then invoice for the class provided. This process is how TPCN monitors class attendance across the Network. The information is available to TPCN in real time anytime a class is being taught.

**TPCN Monitoring Curriculum** – A Provider is unable to seek reimbursement for a class unless TPCN has approved the curriculum and content of the class in advance. TPCN’s Education Manager reviews and approves these curricula and materials.

During the FY16 and FY17 biennium, TPCN’s Provider subcontractor network delivered over 103,000 hours of education to Program clients and adoptive parents in its 121 locations

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throughout Texas. During the final six months of FY18 and all of FY19, TPCN is projecting to provide over 205,000 hours of education to its clients in 140+ locations throughout Texas. Obviously, detailing 205,000 hours of educational classes in 140+ locations broken out by topics, presentation-dates, locations, and presenters would involve a 12 volume treatise of information. Instead, TPCN will provide a sampling of the classes that will be taught, a list of topics that those classes will cover, and a projection of class hours grouped together by similarity. HHSC is welcome to request additional information about the classes that will be taught as needed.

**Sampling of Classes that Will Be Taught by Provider Subcontractors in FY18 and FY19:**

24/7 Dad

5 Steps to a Better Birth

Age - Appropriate Play Curriculum

Babywearing 101

Birth Parent Bill of Rights Safety Start at Home

Breastfeeding Class

Breastfeeding Your Newborn: Giving your baby the very best.

Building Self-Esteem Through Positive Assertiveness

Car Seat Safety Class

Causes of Preeclampsia

Changing Your Life Through Better Money Management

Child Development 0-6 months

Child Development, Medical Solutions and Therapies at Home

Child Food Nutrition

Child Nutrition - feeding your baby

Conversations About Destiny

Conversations About Forgiveness

Conversations About Self-Esteem

Cooking Matters for Chefs and Kids

Counseling, Family Interactions and Parenting

CPR & First Aid

Daddy University

Developmental Milestones (7-12 months of age)

Doctor Dad

Early Moments Matter

El Arte de Sobrevivir

El Joven Noble

Entendiendo el embarazo/Una guía completa Guía del Facilitador

Exploring Relationships and Marriage with Fragile Families: Program for Couples

Exploring Relationships and Marriage with Fragile Families: Program for Fathers

Exploring Relationships and Marriage with Fragile Families: Program for Mothers

Eye Contact Means Love

Feeding, Articulation, Language, and Literacy

First Month: What to Expect

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First Year Milestones  
 First Year Milestones  
 First Year Milestones: A Monthly Guide to Your Baby's Growth  
 FORGIVENESS The Freedom to Let Go  
 Foundations for Future  
 Gestational Diabetes  
 Great Beginnings  
 Healing Through Expression: An Expressive Art  
 Health Care Orientation for Medicaid Benefits  
 Health Insurance for you and your baby  
 Healthy Beginnings  
 Healthy Lifestyles  
 Healthy Planning Pregnancy  
 Healthy Pregnancy Planning  
 Holidays with a baby at home - safety tips  
 Home Safety  
 Homework for Emotionally Healthy Children  
 How OAG can help you  
 If You Use Marijuana During Pregnancy  
 Immunizations and Infection Control: Children 0-24 months  
 Infant Massage USA  
 Infant Safety Class  
 Introduction to Car Seat Safety  
 Introduction to Financial Budgeting for families  
 Investing in Your Marriage  
 Is This Really Love?  
 Labor & Delivery Class  
 Learning about Emotional Intelligence and its Role in Parenting  
 Learning about Fatherhood  
 Listen, Love, Play  
 Married and Loving It!  
 Mental Health  
 Mom as a Gateway  
 Money Smart for Grades 9-12  
 Needs Assessment Class  
 Newborn Baby Care  
 Parenting Inside Out  
 Postpartum Care  
 Postpartum Class  
 Practical Money Skills for Life  
 Pregnancy and Beyond: Your Journey... like no other  
 Prenatal Class Graduation Lesson Plan  
 Prenatal Class: Nutrition  
 Prenatal Class: Nutrition Lesson Plan  
 Raising Emotionally Healthy Children



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Relationships Smarts PLUS  
Responsible Relationships  
Rising Food Costs  
SIDS and Shaken Baby Syndrome Prevention  
Siempre Papa  
Skills to Pay the Bill: Mastering Soft Skills for Workplace Success  
Start Smart for Your Baby  
Steps in Infant Vision Development & Eye Screening  
Strategies to Help Picky Eaters  
Teaching social skills to youth  
Texas A&M Today's Mom  
The Baby Human, Learning to Think  
The Baby Human, Learning to Walk  
The Happiest Baby on the Block  
Time Management  
Trimesters of Pregnancy  
Understanding Birth 2nd Edition: A Comprehensive Guide  
Understanding Breastfeeding  
Understanding Pregnancy  
Understanding Your Newborn  
Vaccination Schedule  
You can Quit!

**Topics to be Covered by Provider Subcontractors In Classes in FY18 and FY19:**

Abortion Education  
Abuse  
Adoption Education  
Anger Management  
Babyproofing Home  
Breastfeeding  
Breast Pumping  
Budgeting for Family  
Car seat Training  
Child Support  
Child Vaccinations  
Childbirth  
Cord Blood Banking  
C-Section Primer  
Daycare  
Decision Making  
Education  
Financial  
Guardianship  
Housing  
Infant CPR

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Initial Intake  
Legal  
Life Skills  
Maternal Well-Being  
Maternity Leave  
Medical  
Newborn Care  
Newborn Wrapping  
Other  
Parenting  
Postpartum Depression  
Prenatal Care  
Prenatal Development  
Prenatal Exercise  
Prenatal Nutrition  
Relationship  
Sleep Strategy  
Smoking Cessation  
STD Information  
Stress Management  
Ultrasound Education

**Estimate of Class Hours Grouped Together by Type of Class:**

Month	Childbirth Class Hours	Improving Pregnancy Situation Class Hours	Improving Parenting Situation Class Hours
Mar-18	134	818	2,687
Apr-18	134	818	2,687
May-18	268	1,636	5,374
Jun-18	268	1,636	5,374
Jul-18	402	2,453	8,060
Aug-18	402	2,453	8,060
Sep-18	434	2,650	8,706
Oct-18	434	2,650	8,706
Nov-18	434	2,650	8,706
Dec-18	434	2,650	8,706
Jan-19	496	3,028	9,949
Feb-19	496	3,028	9,949
Mar-19	496	3,028	9,949
Apr-19	496	3,028	9,949
May-19	559	3,407	11,193
Jun-19	559	3,407	11,193
Jul-19	559	3,407	11,193

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Aug-19

559

3,407

11,193

l. 2.6.4: Employment Assistance and Professional Development **THIS  
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TPCN's Provider subcontractors offer classes and counseling/mentoring that helps clients with employment assistance and professional development. Resume development, interviewing skills, and actual assistance looking for jobs all qualify as services that improve the pregnancy or parenting situation and are reimbursable Program services. Additionally, referrals to Texas Workforce Commission are encouraged and are billable referrals.

m. 2.6.5: Housing **THIS ENTIRE SECTION IS A TRADE SECRET**

TPCN will not be reimbursing Providers for specifically offering housing to Clients. The Program is set up to only reimburse for the four key services – counseling/mentoring, educational classes, referrals, and material assistance. Provider subcontractors that are able to offer housing also have the ability to make certain services mandatory in exchange for providing housing. So many residential units are able to provide client services every day of the week and sometimes multiple times a day. This intense form of counseling and educational services offers tremendous benefits for clients because they have someone intensely focused on their needs to become self-sufficient and a better parent. Thus, Provider subcontractors that are able to offer housing often see their reimbursements increase significantly to help offset the cost of the housing.

n. 2.6.9 Decision Support Services **THIS ENTIRE SECTION IS A TRADE  
SECRET**

Decision support services are offered by all Provider locations across the A2A Program. These services are the core services of the Program, and are the primary reason why the Program exists.

TPCN considers options counseling to be the core service of the Program, and it is required to be offered at every Provider location, no matter the type of Provider (even adoption agencies, residential units, and social service agencies). The primary tool used by TPCN and the Network to administer options counseling is *A Woman's Right to Know*. All Providers are required to keep the publication on hand and TPCN monitors Provider locations to ensure that copies are onsite. Some other educational materials are used by Providers, but any material that is used in conjunction with Program resources must be approved by TPCN in advance before it may be used. Additionally, TPCN has provided HHSC with copies of all educational materials that TPCN has purchased with Program funds and that have been distributed to its Provider Network.

o. 2.7.1: Monthly Reports

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TPCN is already providing hundreds of pages of reports monthly and quarterly to HHSC regarding the Program; however, all reports required by the RFA and/or HHSC will be provided by TPCN.

p. 2.7.2: Annual Reports

TPCN is already providing hundreds of pages of reports monthly and quarterly to HHSC regarding the Program; however, all reports required by the RFA and/or HHSC will be provided by TPCN.

3. Describe Applicant's plans to monitor its clinics or network of clinics. Specifically outline relevant administrative and clinical practices (maximum of 4 pages). **THIS**

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TPCN has described its monitoring of its Provider subcontractors in great detail in other parts of this RFA. Additionally TPCN has provided HHSC with a schedule of annual monitorings that will take place through April 2018.

A summary of areas monitored at an annual monitoring follows:

**Part 1: Clearance Review**

*Purpose:* TPCN requires that Provider must conduct criminal, sex offender, and child abuse background checks on behalf of all staff and volunteers that have direct contact with Program clients. Clearance documents covering the entire fiscal year must all be present with an exception for up to 90 days grace period between DFPS clearances dates. Program Compliance Managers check the clearances for staff and volunteers who have billed in BriteWorks after the beginning of the fiscal year.

**Part 2: Document Review**

- Facilities Floor Plan
- Disability Access Accommodation Policy
- Current Board of Directors List
- Franchise Tax Account Status
- Current Organization Chart
- Employee Licenses or Credentials
- Employee Nondiscrimination Policy
- Organization Description
- Organizational Advertising and Brochures
- Abortion Policy
- Abortion Options Counseling Procedures
- Abortifacient Contraception Policy

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- Client Services Nondiscrimination Policy
- Employee/Volunteer Acknowledgment Re: Confidentiality Policy
- Confidentiality Policy
- Release of Confidential Information Consent Form
- Grievance Policy
- Limited English Proficiency Policy
- Board of Directors Meeting Dates
- Client Services Policies & Procedures Manual
- Employee Manual
- Counselor Training Materials

Part 3: Interview Regarding Material Changes

Part 4: Facilities Walk-Through

- Exterior
- Disability Access
- Client Notices
- Client Waiting Area
- Smoke Detectors
- Fire Extinguishers
- Counseling Room
- Classroom
- Materials Assistance Room
- Policies & Procedures Manual
- Client Education Materials
- Client Records

Part 5: Prior Deficiencies Review

Part 6: Annual Monitoring Survey: Certification

Part 7: Guidelines: Client Support Profile

Part 8: Guidelines: Organization Description

Part 9: Annual Monitoring Attestation

The following statements are a Provider's attestation to continued compliance with the Provider Agreement and the Program rules it references.





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1. My organization provided BriteWorks training (through TPCN resources and/or customized training) for all new employees and volunteers, and I ensure that all new employees and volunteers read the compliance manual and complete training before beginning to invoice Program services in BriteWorks. Yes \_\_\_No\_\_\_
2. My organization provided annual BriteWorks training (through TPCN resources and personally) for all employees and volunteers prior to their billing for Program Services on or after September 1, 2017, and ensured that all employees and volunteers read the revised compliance manual before beginning to invoice for Program services in BriteWorks on or after September 1, 2017. Yes \_\_\_No\_\_\_
3. My organization has sent all educational materials used by my organization to TPCN for review or has documented confirmation from TPCN staff that the materials in use have been approved. Yes \_\_\_No\_\_\_
4. My organization has sent to TPCN for review all educational materials used by outside instructors that provide Program services to my organizations' eligible clients. Yes \_\_\_No\_\_\_
5. My organization uses and/or distributes the 2016 version of the State of Texas publication *A Woman's Right to Know* to educate pregnant clients about their options. Yes \_\_\_No\_\_\_
6. My organization provides one client survey to each Program client receiving Program services from my organization. Yes \_\_\_No\_\_\_
7. My organization promotes childbirth rather than abortion in its response to a pregnancy, and agrees that it will not promote, refer, or provide abortions or abortifacient contraceptives to clients, regardless of whether they are Program eligible. Yes \_\_\_No\_\_\_
8. My organization does not use or distribute to clients (regardless of whether they are Program eligible) any educational materials that promote or refer for abortions or abortifacient contraception. Yes \_\_\_No\_\_\_
9. My organization is not in any way associated or affiliated with any entity that provides, promotes, or refers for abortion. Yes \_\_\_No\_\_\_
10. My organization is a legally separate entity from any abortion-service provider and will not enter into any legal relationship with an abortion services provider. Yes \_\_\_No\_\_\_

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11. My organization does not contract with or transfer any funds, through gift or payment, to an abortion-services provider or affiliate. Yes \_\_\_No\_\_\_
12. My organization does not share any employees or members of its governing body with an abortion-services provider or affiliate. Yes \_\_\_No\_\_\_
13. My organization does not display or use the names or trademarks of any abortion-services provider in describing or naming itself. Yes \_\_\_No\_\_\_
14. My organization does not use graphic images or graphic descriptions of abortion procedures in its services, regardless of whether the client is Program-eligible. Yes \_\_\_No\_\_\_
15. My organization protects TPCN confidential materials and the BriteWorks PS System, including all manuals forms, and correspondence from unauthorized disclosure, using the same degree of care and confidentiality that it uses to protect our own property and proprietary information. Yes \_\_\_No\_\_\_
16. My organization does not use the name of, or directly or indirectly refer to, TPCN, HHSC, the State of Texas, or any other State agency in any media release, public announcement, or public disclosure, including in any promotional or marketing materials, customer lists, or business presentations without prior written permission from TPCN. Yes \_\_\_No\_\_\_
17. My organization has notified TPCN via email and phone call of any request for interviews or publicity coming from third party journalists, websites, or media organizations that possibly could depict Provider or the Program in an unfavorable or unflattering manner. Yes \_\_\_No\_\_\_
18. My organization maintains for a period of seven (7) years after the date of submission of the final billing supporting financial information and documents that are sufficient to ensure the accuracy and validity of Provider's invoices. Yes \_\_\_No\_\_\_
19. My organization is properly licensed, certified, and/or has proper permits (if any) to perform any activity related to the services we perform. Yes \_\_\_No\_\_\_
20. My organization only provides services to clients in TPCN-approved spaces. Note: services provided offsite in locations that the Provider does not control are allowed as long as all other Program rules are followed there. Yes \_\_\_No\_\_\_
21. I understand that my organization must seek TPCN approval when expanding current facilities or moving to new facilities before providing Program services there, including locations where my organization has provided offsite Program services before my organization took control of them. Yes \_\_\_No\_\_\_



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22. My organization does not employ anyone or utilize volunteer services of anyone who will have direct contact with Program clients if that person has a conviction listed in §250.006 of the Texas Health and Safety Code. Yes \_\_\_No\_\_\_
23. My organization does not employ or use volunteer services of someone with direct contact with Program clients if that person does not have a clear background check unless that person has been approved by the Board of Directors, and the board's president has submitted the "Board Waiver Form" to TPCN. (Note that background checks that return a conviction or convictions listed in the Texas Health and Safety Code §250.006 invalidate your organizations use of that employee or volunteer.) Yes \_\_\_No\_\_\_
24. My organization provides clients with compassionate, respectful services and avoids coercion, delay, and dishonesty in providing services. Yes \_\_\_No\_\_\_
25. My organization provides Program Services to Program eligible clients free of charge, and without regard to client's income or assets. Yes \_\_\_No\_\_\_
4. Applicant's response must not exceed 23 pages.

## CONTRACT ATTACHMENT D



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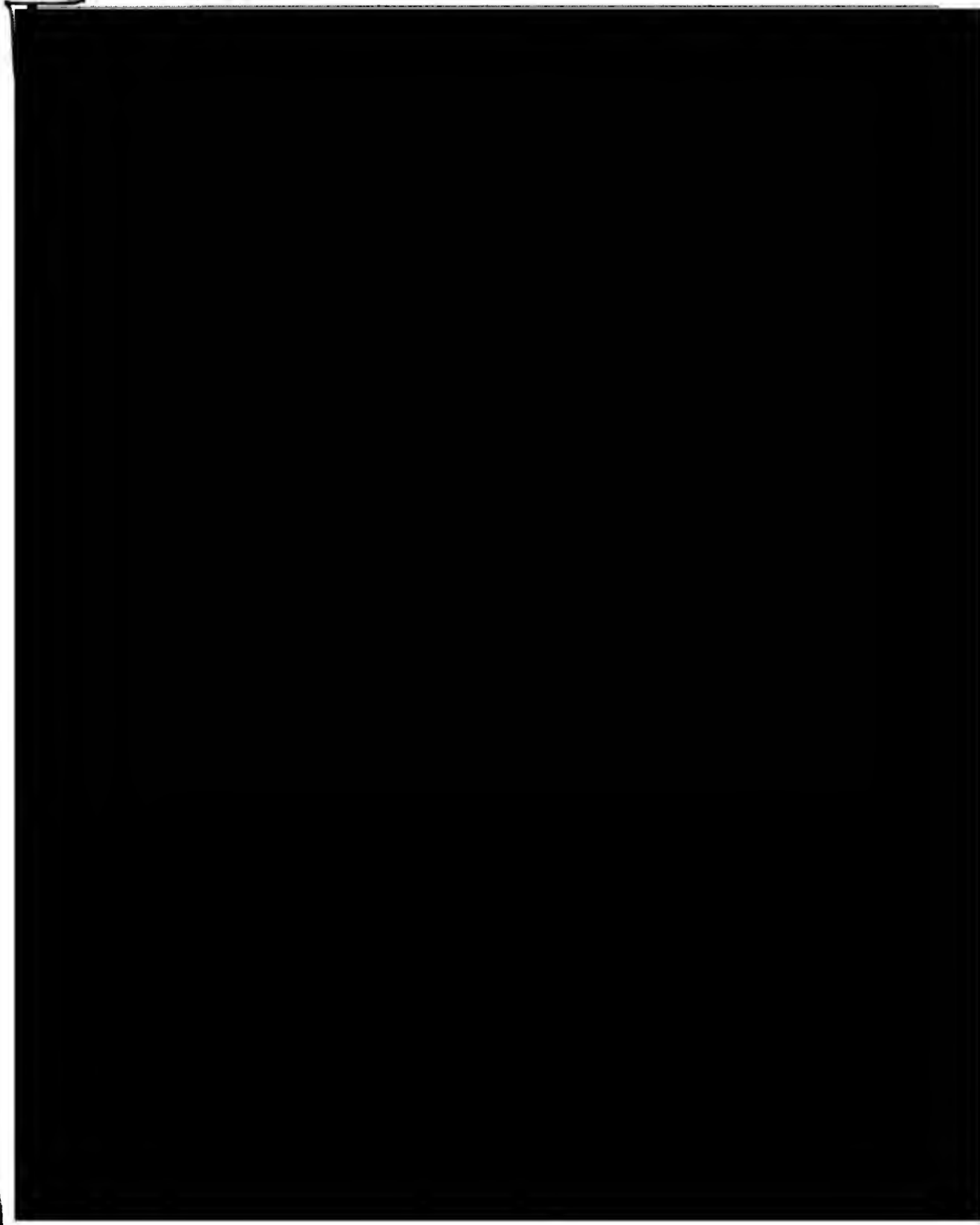
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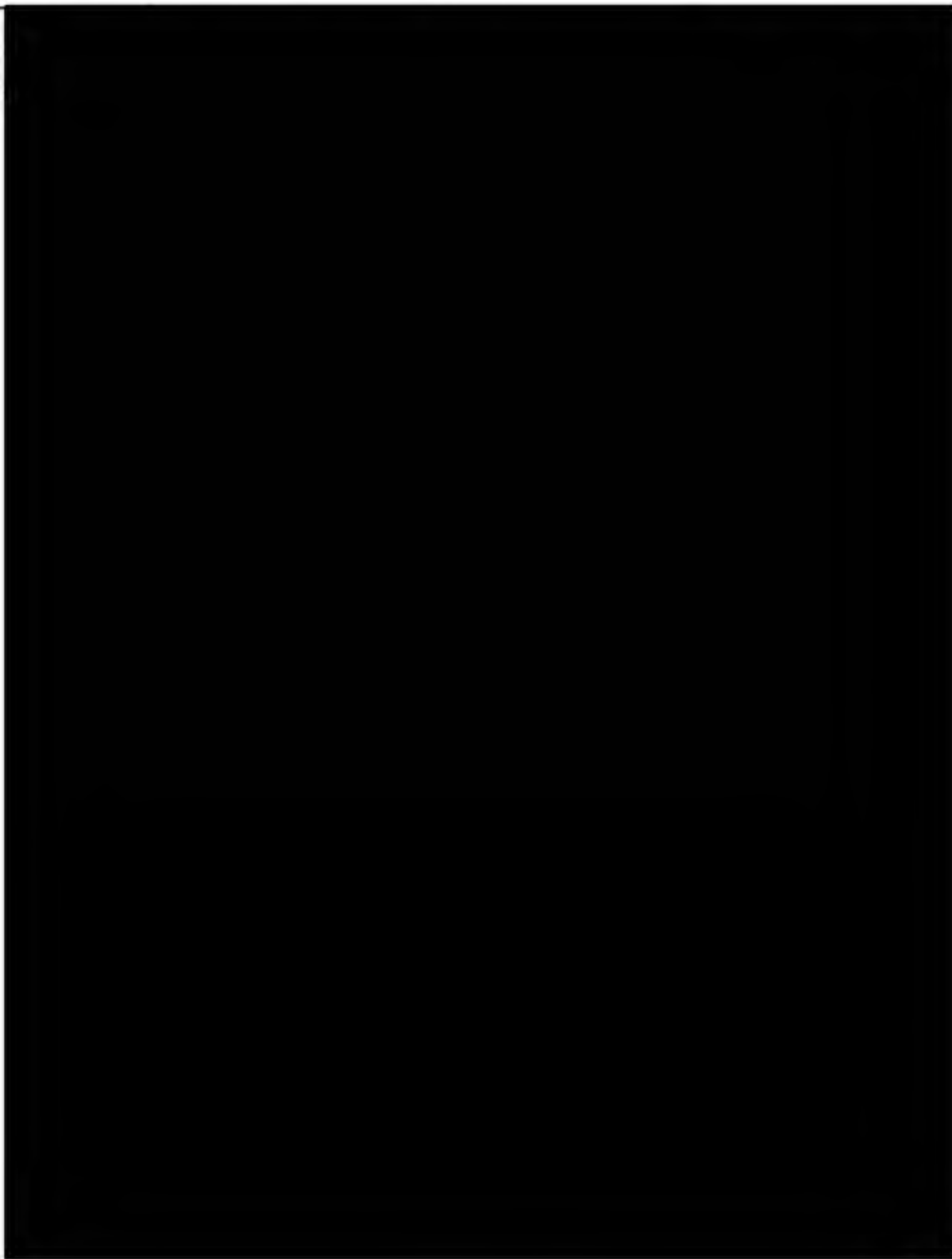
TEXAS  
PREGNANCY CARE  
NETWORK

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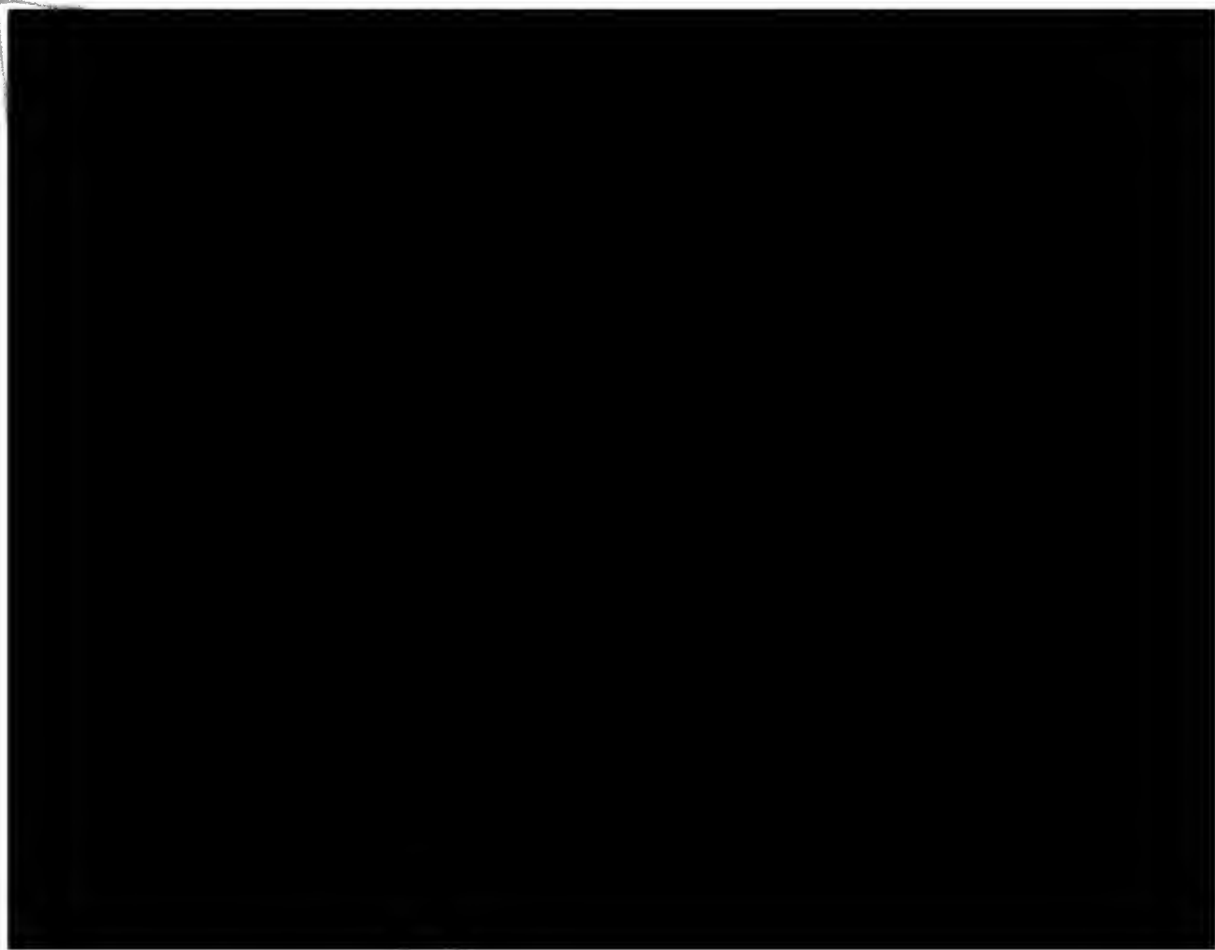


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Complete the Spiritual Preferences Form

After you create the UCI, BriteWorks will ask if you would like to complete the Spiritual Preferences Form. If you wait until later the UCI will be displayed on your home page under "Participants requiring Spiritual Preferences."

The SPF needs to be presented to every new Program-eligible client and the client must be present for this step. You have a choice to do this immediately following the intake process that you just completed (if the client is present) or you can wait until later.

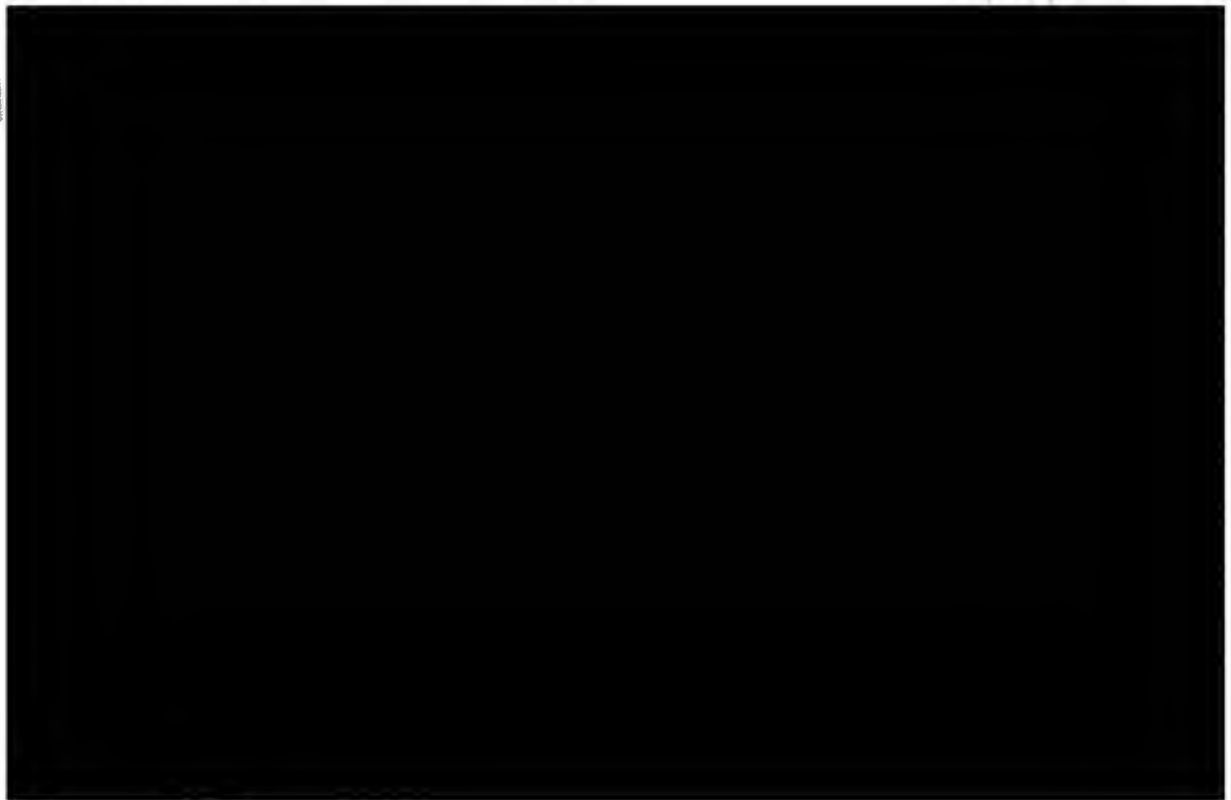
The SPF accomplishes the disclosure element of spiritual services separation. It also allows the participant to elect to receive or not receive spiritual services if your organization offers them.





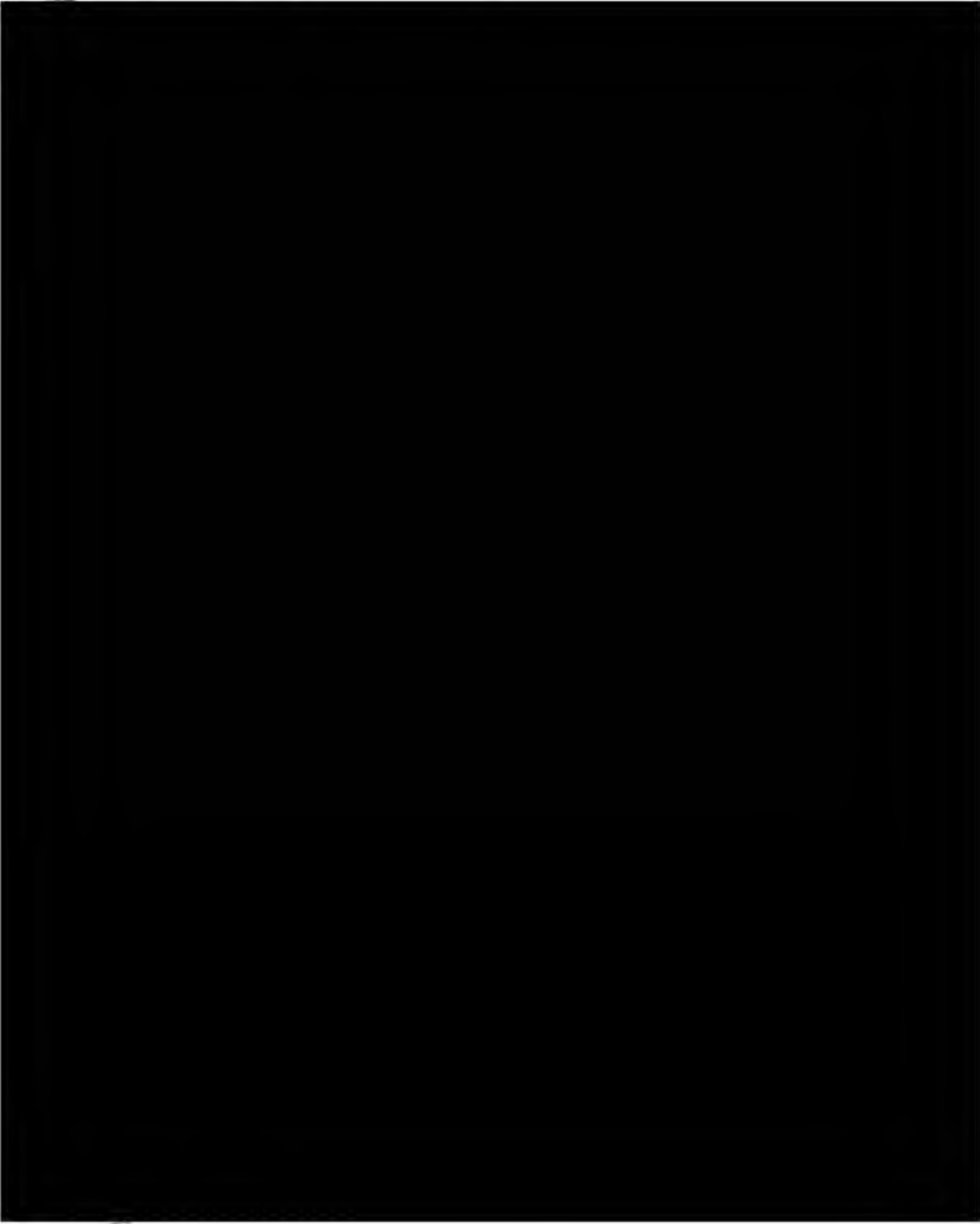
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The SPF has been tailored to whether or not your organization offers in-house spiritual counseling or classes. If you do not offer spiritual services, the client will just sign acknowledging this and the counselor will sign as well. If you do offer spiritual services, the client will need to choose whether they want to be offered spiritual services. The counselor will hand or "share" the device with the client, read or explain the SPF screen to them, have the client make a choice (if applicable), and then have the client sign and return the device to the counselor. Then the counselor will sign. You will help the client understand that if your organization offers spiritual services, they are completely voluntary to the client, and that the client will receive the same Program services whether or not they want to receive spiritual services.





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Counseling can occur with:

- Any eligible client;
- A client who's suffered loss via miscarriage, infant death, or adoption (Loss Counseling; described in subsequent section below);
- A family member of an eligible client (Family Counseling; described in subsequent sections);  
or
- An adoptive parent (if your organization is enabled to provide these services).

Counseling is typically conducted face-to-face and in person, whether at your agency or at some offsite location.

Reimbursable counseling will always involve communication: one person talking (or signing in the case of a hearing-impaired counselor or client) and another listening or watching, or vice versa. Electronic communication such as email or texting is not reimbursable, nor is simply playing an educational video for a client with no discussion of content

j. 2.6.2: Goods and Services



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Materials assistance is defined as the distribution of tangible goods to an eligible beneficiary for the purpose of improving a client's pregnancy or parenting situation. **In order to be reimbursable, materials assistance must be accompanied by a class or at least 15 minutes of counseling during the same session.**

Distributions are appropriate for reimbursement when they can properly be categorized within any of the following seven categories:

- Food
- Maternity Clothing
- Diapers
- Baby Clothing
- Baby Furniture
- Baby Accessories
- Toiletries

Materials assistance is capped at 36 distributions over the course of a period extending from anytime during the client's pregnancy up to the child's third birthday.

k. 2.6.3: Classes

A reimbursable "class" is defined as one or more eligible beneficiaries gathered for at least one hour's worth of educational instruction that improves the pregnancy or parenting situation.

All educational content must be approved by TPCN. If your instructor is not using any materials beyond a lecture, you can use Appendix J to help summarize a class outline for submission.

Again, as with counseling, a class must involve speech to be a reimbursable event. Playing an hour-long video to a group of students is not reimbursable as an hour-long class. However, using video clips throughout a class is acceptable.

l. 2.6.4: Employment Assistance and Professional Development

TPCN's Provider subcontractors offer classes and counseling/mentoring that helps clients with employment assistance and professional development. Resume development, interviewing skills, and actual assistance looking for jobs all qualify as services that improve the pregnancy or parenting situation and are reimbursable Program services. Additionally, referrals to Texas Workforce Commission are encouraged and are billable referrals.

m. 2.6.5: Housing

TPCN will not be reimbursing Providers for specifically offering housing to Clients. The Program is set up to only reimburse for the four key services – counseling/mentoring, educational classes,



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referrals, and material assistance. Provider subcontractors that are able to offer housing also have the ability to make certain services mandatory in exchange for providing housing. So many residential units are able to provide client services every day of the week and sometimes multiple times a day. This intense form of counseling and educational services offers tremendous benefits for clients because they have someone intensely focused on their needs to become self-sufficient and a better parent. Thus, Provider subcontractors that are able to offer housing often see their reimbursements increase significantly to help offset the cost of the housing.

n. 2.6.9 Decision Support Services

Decision support services are offered by all Provider locations across the A2A Program. These services are the core services of the Program, and are the primary reason why the Program exists.

o. 2.7.1: Monthly Reports

TPCN is already providing hundreds of pages of reports monthly and quarterly to HHSC regarding the Program; however, all reports required by the RFA and/or HHSC will be provided by TPCN.

p. 2.7.2: Annual Reports

TPCN is already providing hundreds of pages of reports monthly and quarterly to HHSC regarding the Program; however, all reports required by the RFA and/or HHSC will be provided by TPCN.

3. Describe Applicant's plans to monitor its clinics or network of clinics. Specifically outline relevant administrative and clinical practices (maximum of 4 pages).

TPCN has described its monitoring of its Provider subcontractors in great detail in other parts of this RFA. Additionally TPCN has provided HHSC with a schedule of annual monitorings that will take place through April 2018.

A summary of areas monitored at an annual monitoring follows:

Part 1: Clearance Review

*Purpose:* TPCN requires that Provider must conduct criminal, sex offender, and child abuse background checks on behalf of all staff and volunteers that have direct contact with Program clients. Clearance documents covering the entire fiscal year must all be present with an exception for up to 90 days grace period between DFPS clearances dates. Program Compliance Managers check the clearances for staff and volunteers who have billed in BriteWorks after the beginning of the fiscal year.

Part 2: Document Review

- Facilities Floor Plan
- Disability Access Accommodation Policy
- Current Board of Directors List
- Franchise Tax Account Status
- Current Organization Chart



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- Employee Licenses or Credentials
- Employee Nondiscrimination Policy
- Organization Description
- Organizational Advertising and Brochures
- Abortion Policy
- Abortion Options Counseling Procedures
- Abortifacient Contraception Policy
- Client Services Nondiscrimination Policy
- Employee/Volunteer Acknowledgment Re: Confidentiality Policy
- Confidentiality Policy
- Release of Confidential Information Consent Form
- Grievance Policy
- Limited English Proficiency Policy
- Board of Directors Meeting Dates
- Client Services Policies & Procedures Manual
- Employee Manual
- Counselor Training Materials

**Part 3: Interview Regarding Material Changes**

**Part 4: Facilities Walk-Through**

- Exterior
- Disability Access
- Client Notices
- Client Waiting Area
- Smoke Detectors
- Fire Extinguishers
- Counseling Room
- Classroom
- Materials Assistance Room
- Policies & Procedures Manual
- Client Education Materials
- Client Records



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Part 5: Prior Deficiencies Review

Part 6: Annual Monitoring Survey: Certification

Part 7: Guidelines: Client Support Profile

Part 8: Guidelines: Organization Description

Part 9: Annual Monitoring Attestation

The following statements are a Provider's attestation to continued compliance with the Provider Agreement and the Program rules it references.

1. My organization provided BriteWorks training (through TPCN resources and/or customized training) for all new employees and volunteers, and I ensure that all new employees and volunteers read the compliance manual and complete training before beginning to invoice Program services in BriteWorks. Yes \_\_\_ No \_\_\_
2. My organization provided annual BriteWorks training (through TPCN resources and personally) for all employees and volunteers prior to their billing for Program Services on or after September 1, 2017, and ensured that all employees and volunteers read the revised compliance manual before beginning to invoice for Program services in BriteWorks on or after September 1, 2017. Yes \_\_\_ No \_\_\_
3. My organization has sent all educational materials used by my organization to TPCN for review or has documented confirmation from TPCN staff that the materials in use have been approved. Yes \_\_\_ No \_\_\_
4. My organization has sent to TPCN for review all educational materials used by outside instructors that provide Program services to my organizations' eligible clients. Yes \_\_\_ No \_\_\_
5. My organization uses and/or distributes the 2016 version of the State of Texas publication *A Woman's Right to Know* to educate pregnant clients about their options. Yes \_\_\_ No \_\_\_
6. My organization provides one client survey to each Program client receiving Program services from my organization. Yes \_\_\_ No \_\_\_
7. My organization promotes childbirth rather than abortion in its response to a pregnancy, and agrees that it will not promote, refer, or provide abortions or abortifacient contraceptives to clients, regardless of whether they are Program eligible. Yes \_\_\_ No \_\_\_



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8. My organization does not use or distribute to clients (regardless of whether they are Program eligible) any educational materials that promote or refer for abortions or abortifacient contraception. Yes \_\_\_ No \_\_\_
9. My organization is not in any way associated or affiliated with any entity that provides, promotes, or refers for abortion. Yes \_\_\_ No \_\_\_
10. My organization is a legally separate entity from any abortion-service provider and will not enter into any legal relationship with an abortion services provider. Yes \_\_\_ No \_\_\_
11. My organization does not contract with or transfer any funds, through gift or payment, to an abortion-services provider or affiliate. Yes \_\_\_ No \_\_\_
12. My organization does not share any employees or members of its governing body with an abortion-services provider or affiliate. Yes \_\_\_ No \_\_\_
13. My organization does not display or use the names or trademarks of any abortion-services provider in describing or naming itself. Yes \_\_\_ No \_\_\_
14. My organization does not use graphic images or graphic descriptions of abortion procedures in its services, regardless of whether the client is Program-eligible. Yes \_\_\_ No \_\_\_
15. My organization protects TPCN confidential materials and the BriteWorks PS System, including all manuals forms, and correspondence from unauthorized disclosure, using the same degree of care and confidentiality that it uses to protect our own property and proprietary information. Yes \_\_\_ No \_\_\_
16. My organization does not use the name of, or directly or indirectly refer to, TPCN, HHSC, the State of Texas, or any other State agency in any media release, public announcement, or public disclosure, including in any promotional or marketing materials, customer lists, or business presentations without prior written permission from TPCN. Yes \_\_\_ No \_\_\_
17. My organization has notified TPCN via email and phone call of any request for interviews or publicity coming from third party journalists, websites, or media organizations that possibly could depict Provider or the Program in an unfavorable or unflattering manner. Yes \_\_\_ No \_\_\_
18. My organization maintains for a period of seven (7) years after the date of submission of the final billing supporting financial information and documents that are sufficient to ensure the accuracy and validity of Provider's invoices. Yes \_\_\_ No \_\_\_





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19. My organization is properly licensed, certified, and/or has proper permits (if any) to perform any activity related to the services we perform. Yes \_\_\_ No \_\_\_
20. My organization only provides services to clients in TPCN-approved spaces. Note: services provided offsite in locations that the Provider does not control are allowed as long as all other Program rules are followed there. Yes \_\_\_ No \_\_\_
21. I understand that my organization must seek TPCN approval when expanding current facilities or moving to new facilities before providing Program services there, including locations where my organization has provided offsite Program services before my organization took control of them. Yes \_\_\_ No \_\_\_
22. My organization does not employ anyone or utilize volunteer services of anyone who will have direct contact with Program clients if that person has a conviction listed in §250.006 of the Texas Health and Safety Code. Yes \_\_\_ No \_\_\_
23. My organization does not employ or use volunteer services of someone with direct contact with Program clients if that person does not have a clear background check unless that person has been approved by the Board of Directors, and the board's president has submitted the "Board Waiver Form" to TPCN. (Note that background checks that return a conviction or convictions listed in the Texas Health and Safety Code §250.006 invalidate your organizations use of that employee or volunteer.) Yes \_\_\_ No \_\_\_
24. My organization provides clients with compassionate, respectful services and avoids coercion, delay, and dishonesty in providing services. Yes \_\_\_ No \_\_\_
25. My organization provides Program Services to Program eligible clients free of charge, and without regard to client's income or assets. Yes \_\_\_ No \_\_\_
4. Applicant's response must not exceed 23 pages.